

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

~~SEALED~~

DOC NO  
REC'D/FILED

UNITED STATES OF AMERICA

INDICTMENT

v.

Case No. 19-CR-08-JDP

PETER OPPENHEIM  
CLERK US DIST COU  
WD OF WI

MATTHEW BULOVSKY,  
a/k/a Amy Chang, and  
a/k/a Kellen Dugenske,

18 U.S.C. § 2252(a)(2)  
18 U.S.C. § 2252(a)(4)(B)  
18 U.S.C. § 2253

Defendant.

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THE GRAND JURY CHARGES:

COUNT 1

On or about June 19, 2018, in the Western District of Wisconsin, the defendant,  
MATTHEW BULOVSKY, a/k/a Amy Chang,  
knowingly distributed a visual depiction using any means or facility of interstate and  
foreign commerce, and the production of such visual depiction involved the use of a  
minor engaging in sexually explicit conduct, and the depiction was of such conduct.  
Specifically, BULOVSKY used Kik, an instant messaging application, to send a video of  
a minor engaged in sexually explicit conduct to another Kik user.

(In violation of Title 18, United States Code, Section 2252(a)(2)).

COUNT 2

On or about June 27, 2018, in the Western District of Wisconsin, the defendant,  
MATTHEW BULOVSKY, a/k/a Amy Chang,  
knowingly distributed visual depictions using any means or facility of interstate and  
foreign commerce, and the production of such visual depictions involved the use of a

minor engaging in sexually explicit conduct, and the depictions were of such conduct. Specifically, BULOVSKY used Kik, an instant messaging application, to send six images of minors engaged in sexually explicit conduct to another Kik user.

(In violation of Title 18, United States Code, Section 2252(a)(2)).

COUNT 3

On or about November 26, 2018, in the Western District of Wisconsin, the defendant,

MATTHEW BULOVSKY, a/k/a Kellen Dugenske, knowingly distributed a visual depiction using any means or facility of interstate and foreign commerce, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and the depiction was of such conduct. Specifically, BULOVSKY used Kik, an instant messaging application, to send an image of a minor engaged in sexually explicit conduct to another Kik user.

(In violation of Title 18, United States Code, Section 2252(a)(2)).

COUNT 4

On or about November 27, 2018, in the Western District of Wisconsin, the defendant,

MATTHEW BULOVSKY, knowingly possessed an Apple iPhone 7 cell phone containing visual depictions that had been produced using materials which had been shipped and transported in interstate and foreign commerce, specifically the Apple iPhone 7 cell phone, and the

production of such visual depictions involved the use of minors engaging in sexually explicit conduct and the depictions were of such conduct.

(In violation of Title 18, United States Code, Sections 2252(a)(4)(B)).

FORFEITURE ALLEGATION

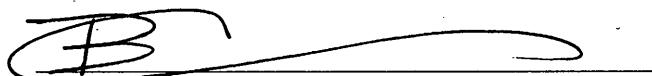
As a result of the offenses charged in Counts 1-4 of this indictment, and upon conviction for violating Title 18, United States Code, Sections 2252(a)(2) and 2252(a)(4), the defendant,

MATTHEW BULOVSKY,

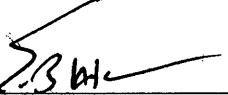
shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253, his right, title, and interest in the following:

- (1) Any and all visual depictions which contain images which are or appear to be child pornography, together with the storage media in which they are contained.
- (2) Any and all property used or intended to be used to commit or to promote the commission of the aforementioned offense, including an Apple iPhone 7 cell phone.

A TRUE BILL

  
\_\_\_\_\_  
PRESIDING JUROR

Indictment returned: 1/9/2019

  
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SCOTT C. BLADER  
United States Attorney